## **CASE NO 18-DCR-0152**

10/26/2018 11:25 A Patti L. Henry

District Clerk

Chambers County, Texas

STATE OF TEXAS § IN THE COUNTY OF

§ § 344TH JUDICIAL DISTRICT COURT VS.

§

ZENA COLLINS STEPHENS **CHAMBERS COUNTY, TEXAS** 

## **DEFENDANT'S REQUEST FOR DISCOVERY PURSUANT TO 39.14**

COMES NOW the Defendant, ZENA COLLINS STEPHENS and timely files this discovery request pursuant to Texas Code Criminal Procedure 39.14(a) and 39.14(b).

- 1. The defendant request that the State produce all materials subject to 39.14(a) and 39.14(b)
- 2. The defendant request that pursuant to 39.14(c) the Court conduct a hearing on any redaction to determine whether the State can meet its high burden of proof to withhold any information.

Respectfully submitted,

/S/Russell Wilson II Russell Wilson II State Bar No. 00794870 Law Offices of Russell Wilson II 1910 Pacific Ave. Suite 15100 Dallas, Texas 75201 Telephone: (469) 573-0211 E-mail- Russell@russellwilsonlaw.com

ATTORNEY FOR DEFENDANT **DEFENDANT: ZENA COLLINS STEPHENS** 

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of a foregoing pleading has been served on the District Attorney's Office, CHAMBERS COUNTY, TEXAS, in accordance with applicable rules of procedure, on Friday, October 26, 2018.

> /S/Russell Wilson II Russell Wilson II